

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
ECSM UTILITY CONTRACTORS, INC.	:	CASE NO. 1-14-02062-MDF
Debtor/Movant	:	CHAPTER 11
	:	
v.	:	
	:	
UNITED STATES TRUSTEE,	:	
PF FUNDING GROUP, LLC	:	
Respondent	:	

MOTION TO SELL EXCESS MATERIALS
FREE AND CLEAR OF LIENS

AND NOW, comes Debtor, ECSM Utility Contractors, Inc., by and through its attorney, Gary J. Imblum, and pursuant to 11 U.S.C. § 363 and respectfully represents:

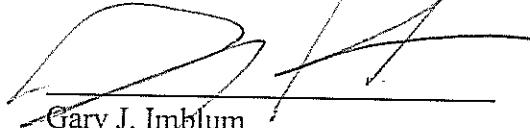
1. Debtor filed a voluntary Petition under Chapter 11 of the Bankruptcy Code on April 30, 2014.
2. Debtor is the owner of excess materials, a list of which is attached hereto as Exhibit "A".
3. PF Funding has a security interest in said materials. However, PF Funding has agreed to waive its right to the proceeds from said sale.
4. Debtor requests Court approval to begin marketing on line and sell said excess materials. "Total price" listed on Exhibit "A" is the minimum bid that will be accepted.

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WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order approving the sale of excess materials, free and clear of liens.

Respectfully submitted,

IMBLUM LAW OFFICES, P.C.

A handwritten signature in dark ink, appearing to read 'Gary J. Imblum', is written over a horizontal line.

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Dated: 3/23/15